

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

MAXWELL KADEL, *et al.*,

Plaintiffs,

v.

DALE FOLWELL, *et al.*,

Defendants.

No. 1:19-cv-00272-LCB-LPA

**STATE HEALTH PLAN DEFENDANTS'
PRETRIAL DISCLOSURES**

Defendants, the North Carolina State Health Plan for Teachers and State Employees, Dale Folwell (in his official capacity as State Treasurer of North Carolina), and Dee Jones (in her official capacity as Executive Administrator of the State Health Plan) (the “Plan Defendants”), through the undersigned counsel, and pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure and the Court’s Order at Dkt. #222 hereby provide their Pretrial Disclosures as set forth in the following exhibits:

- Exhibit 1: Plan Defendants’ Witness List, identifying those the Plan Defendants expect to present and those they may call if the need arises;
- Exhibit 2: Plan Defendants’ Exhibit List, identifying the documents or other exhibits, including those items the Plan Defendants expect to offer and those they may offer if the need arises. In addition to the documents identified therein,

the Plan Defendants may use as exhibits any documents identified by Plaintiffs or other Defendants in their Pretrial Disclosures. The Plan Defendants also reserve the right to use such documents or other exhibits as may be necessary to rebut or impeach.

Respectfully submitted, this the 3rd day of June, 2022.

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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of June, the foregoing was filed electronically with the Clerk of Court using the CM/ECF electronic filing system, which will send notification of such filing to all registered users.

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